

State of Tennessee LWDA Assessment

Sprint 7 – Southwest Tennessee

May 6, 2019–May 17, 2019

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Executive summary

Summary of observations

Outlined below are the key and consistent themes arising from our interviews with stakeholders and review of documentation:

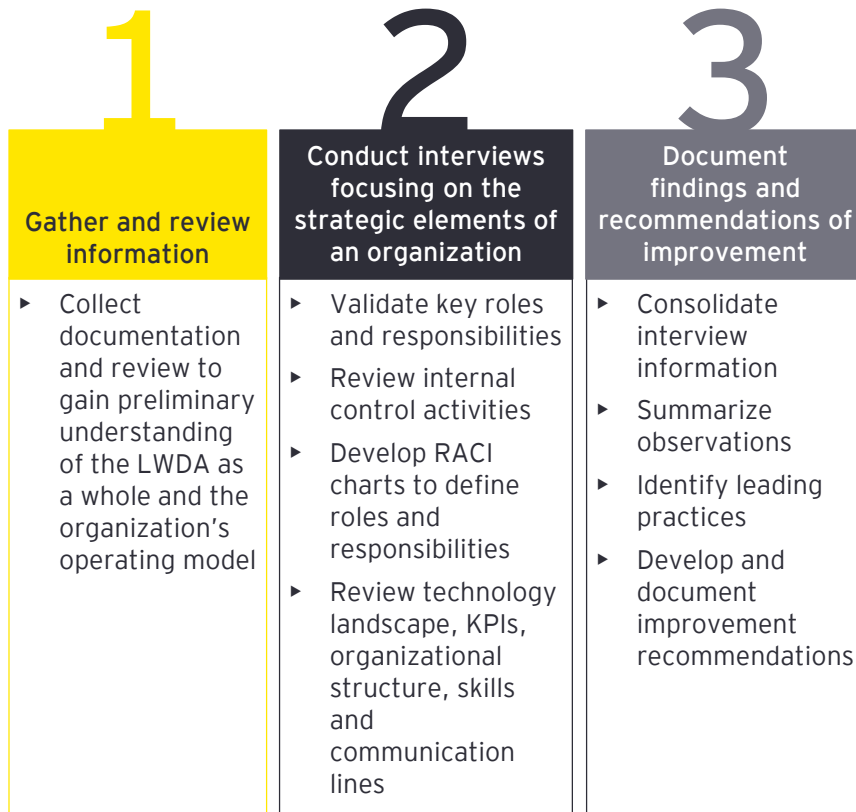
- ▶ The SWLWDB strategic goals are in line with leading practices recommended to other areas.
- ▶ Opportunities exist to clarify roles, responsibilities, accountability and build awareness of key stakeholder roles.
- ▶ The organizational structure of the Southwest Human Resource Agency (the Fiscal Agent and administrative entity) is not operating in an optimal manner and hinders operational effectiveness of the LWDA.
- ▶ The Board has visibility into the performance of the local workforce system due to comprehensive reports provided by the OSO, but there is an opportunity to improve the financial performance monitoring process.
 - ▶ There are communication breakdowns between the Board Staff and the Fiscal Agent, leading to the perception of poor performance and mistrust between the two parties.
- ▶ There are opportunities to improve or strengthen internal controls within the SWLWDA.
 - ▶ Processes and controls for competitively procuring OSO and CSP service providers are not formally defined or documented. There is an opportunity to improve the RFP scoring process to align with leading practices.
 - ▶ The quality and sufficiency of monitoring performed by the SWLWDB Board Staff is limited due to resource limitations and unclear expectations on WIOA responsibilities.
- ▶ There are opportunities to enhance the understanding of value and purpose of the firewall within the LWDA system.
- ▶ Similar to other LWDAs, the SWLWDA faces technology limitations that lead to process inefficiencies.

Assessment approach

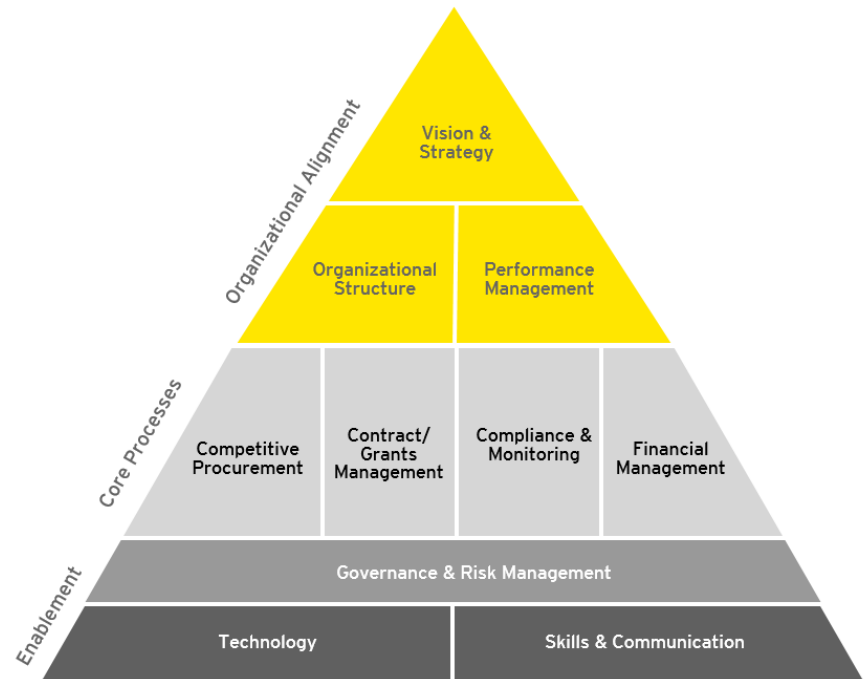
Our framework

EY assessed the organizational fitness and operational controls of the Southwest LWDA by using a holistic framework that focused on strategic elements of an organization.

Assessment methodology



Strategic elements of an organization



Organizational alignment

Vision and strategy

Southwest LWDA strategy

The SWLWDB strategic goals are in line with leading practices recommended to other areas.

Focus area	Key observation
Strategic Vision	The Local Strategic Plan for the SWLWDA includes the vision, goals and implementation strategies. A re-entry program is noted as a key focus area for the LWDA. With input from the WIOA Director and state guidance from Regional Director, two Staff to the Board members wrote and developed the Local Strategic Plan. The Plan was then reviewed by the WIOA Director, LWDA Board, Board Chair, CLEO, Regional Director, Southwest Human Resource Agency (SWHRA) Executive Director and AJC Partners, who provided feedback to finalize the Local Plan. According to the Board Chair, there is an opportunity to further engage the Board in taking a more proactive role in establishing strategic direction of LWDA and providing more meaningful upfront input to the Plan in the future, (see the recommendations section on “Roles and responsibilities page).
Road map to achieve strategic outcomes	The Local Plan is revisited on an annual basis to understand where the LWDA stands against strategic objectives, which is the minimum requirement. Although activities are planned and executed to continue alignment with strategic goals, LWDA lacks a formal, detailed road map with milestones to indicate progress. A road map can track manage actionable steps and progress toward strategic goals as well as increase accountability, engagement and alignment of key stakeholders with achieving goals outlined in the Plan.
Strategy enabling technology	Technology is primarily used for participant case management and as a tool to provide access to and build awareness of AJC services. The Business Services Committee and OSO focus on outreach and marketing of AJC services. They utilize several marketing channels to include social media, local media, Business Chambers, post-secondary institutions, local businesses and job fairs to market AJC services. There is an opportunity to coordinate, track and manage outreach communications using a communication plan.
Recommendations	
<ul style="list-style-type: none"> ▶ The SWLWDB plans are in line with leading practices recommended to other areas. To further enable the achievement of strategic outcomes, the SWLWDB should: <ul style="list-style-type: none"> ▶ Develop and document a road map that includes detailed plans for strategic goals and initiatives with key milestones and be revisited at a more frequent cadence (e.g., quarterly) with input from key stakeholders. ▶ Implement plans to track progress against the strategic plan and provide updates and milestones during Board meetings. ▶ Develop an outreach communication plan to verify that the SWTNWB is making the most efficient use of its marketing and outreach activities. This plan should include tracking success of the different strategies implemented. 	

Organizational alignment

Organizational structure

Roles and responsibilities

Opportunities exist to clarify roles, responsibilities, accountability and build awareness of key stakeholder roles.

Focus area	Key observation
LWDA Leadership	<p>The CLEO is new to the role and recently attended his first LWDA quarterly board meeting. He has expressed the desire to be engaged and proactive in performing his responsibilities, particularly fiscal oversight. However, he currently lacks comprehensive understanding of his responsibilities and welcomed a thorough onboarding and training session. He has not met with the Fiscal Agent to review fiscal reports and has not been approached by the Fiscal Agent so far to perform these reviews since taking on the CLEO role in September 2018. There is an opportunity to further engage the CLEO in fiscal areas.</p> <p>The Board Chair is engaged and proactive in encouraging the Board to take ownership and accountability of establishing and pushing forward LWDA's strategic direction and goals. He has been on the Board for the past five years and recently took on the role as Board Chair. He understands his role responsibilities and believes the Board can benefit from an orientation or technical assistance to better understanding their associated responsibilities and authority in more detail.</p>
OSO and CSP	LWDA stakeholders are satisfied with OSO and CSP performance. They are seen as trusted partners in enabling LWDA's goals and vision. Open communication and collaboration with other AJC partners and stakeholders is strong, which contributes to effective operating of AJC local system.
Regional Director	The Executive Director and Regional Director appear to have a strong working relationship and open communication. The Regional Director acts as a liaison between the Board and the State, and provides guidance to the LWDA to confirm compliance with State requirements. There is an opportunity to clarify her roles responsibilities to encourage more collaboration and communication with other key stakeholders.
Board Staff	The Board Staff is made up of two full-time positions and one part-time position. The FTE count of the Board Staff is lower than other LWDA's, which on average consists of six FTEs. Based on interviews, it was noted that the two full-time FTEs perform a significant amount of activities that are the responsibility of the Fiscal Agent role, as well as monitoring activities, which are the responsibility of the part-time WIOA position. There is an opportunity to better align and clarify role responsibilities to avoid overlap of activities and to increase efficiency.
Recommendations	
<ul style="list-style-type: none"> ▶ Develop a succession plan for the LWDA CLEO. It should include an onboarding session as well as documented CLEO responsibilities, reporting layers, fiscal accountability and clearly state the authority the role possesses. ▶ Provide an orientation session for the Board that includes reviewing responsibilities, accountability and authority of role, as well as performance management leading practices. ▶ Develop a roles and responsibilities guide for roles, in addition to the CLEO, that clearly defines responsibilities including reporting layers, management accountabilities and authority. ▶ Consider additional Board staff to align number of resources with responsibilities. 	

Organizational structure

The organizational structure of the Southwest Human Resource Agency is not operating in an optimal manner and hinders operational effectiveness of the LWDA.

Focus area	Key observation
Southwest Human Resource Agency	<p>The WIOA Director understands his role and responsibilities, and has strong communication lines with the Regional Director. Based on interviews, it was noted that SWHRA Executive Director often exercises considerable oversight over the WIOA Director over day-to-day WIOA program activities, even though he does not consider himself Staff to the Board. The SWHRA Executive Director is heavily involved in the decision-making process, hampering the ability of the WIOA Director to provide timely and effective WIOA program decision-making. The SWHRA Executive Director is also heavily involved in Board meetings, often circumventing the Board Staff. This does not correspond with the organizational structure set up by the LWDA and hinders effective and efficient operations.</p> <p>Based on interviews, the state has provided the SWHRA Executive Director with guidance on his specific role, responsibilities, and authority; however, this has not led to a change in behavior.</p> <p>The WIOA Director will be retiring soon and candidates to fill the position are being reviewed by the state, SWHRA and Board. It is crucial that the new WIOA Director has the ability to implement LWDA strategic direction and the authority to make WIOA program decisions in order to avoid previous limitations.</p>
Recommendations	
<ul style="list-style-type: none">▶ The SWLWDA should consider procuring an administrative entity that allows the WIOA program to operate as designed or consider other organizational structures, such as a 501(c)(3), for the Fiscal Agent and Board Staff to optimize operational efficiency.	

Organizational alignment

Performance management

Performance management

The Board has visibility into the performance of the local workforce system due to comprehensive reports provided by the OSO, but there is an opportunity to improve the financial performance monitoring process.

Focus area	Key observation
Financial visibility	Based on interviews, the performance reporting provided by the Fiscal Agent is not meeting the Board's expectations. For each quarterly SWLWDB meeting, Board Staff develops a status report that shows the budget remaining on each contract. Some stakeholders (including the Board Chair) mentioned that they would like more visibility into how program dollars are being spent, such as a detailed breakdown of expenses per contract. Based on interviews, Board Staff are not provided the data needed to produce a report with that level of detail, while the Fiscal Agent insists this information can be found in the monthly expenditure reports.
OSO and CSP reporting	The OSO puts together a report for quarterly Board meetings by collecting updates from AJC Team Leads and Partners and data from VOS reports. Per the OSO, the Board gives her flexibility in deciding what should be included in the reports. Stakeholders interviewed expressed satisfaction with the quality of OSO reporting. The Board Chair described the reports provided by MCHRA as very comprehensive.
Recommendations	
<ul style="list-style-type: none">▶ Assess current fiscal performance management processes for opportunities to streamline and provide key stakeholders with the level of detail they require.▶ Once those opportunities have been identified, develop action plans to enable these opportunities.	

Governance and risk management

Internal controls

Competitive RFP process

Processes and controls for competitively procuring OSO and CSP service providers are not formally defined or documented. There is an opportunity to improve the RFP scoring process to align with leading practices.

Observation	Leading practice
<ul style="list-style-type: none"> ▶ SWHRA (the Fiscal Agent and administrative entity) has a documented procurement policy. However, the SWLWDB does not have a policy specific to the competitive procurement of OSO and CSP service providers. ▶ Despite SWLWDB demonstrating some leading practices in their competitive procurement process, there was an attempt to circumvent the process and award the contract to the incumbent service provider even though another provider was initially selected. During interviews, stakeholders expressed satisfaction with the performance of the new OSO and CSP provider (MCHRA). We noted the following opportunities for improvement specific to SWLWDB's competitive RFP process: <ul style="list-style-type: none"> ▶ The SWLWDA used a subset of the Board, the Executive Committee, to review and score the bids received for the RFP for the OSO and CSP. However, there was no process for establishing the RFP review committee and confirming competence of members. Requirements for committee members are not defined or documented. ▶ Proposals were not anonymized, meaning the Executive Committee responsible for scoring the bids was aware of the entity who submitted them. This creates the potential for a scoring member to adjust the score based on personal preference. 	<ul style="list-style-type: none"> ▶ The RFP Evaluation Committee should be made up of individuals with various area of expertise (i.e., financial, procurement, career services). Based on subject-matter knowledge or functional area, it may be appropriate for each evaluation committee member to be assigned only a specific section of the proposal to review and score. ▶ Smaller organizations may choose to outsource the RFP process if they determine that their time will be more impactful spent elsewhere. Outsourcing the RFP process can reduce workload and operational costs. ▶ RFP evaluation criteria is clearly defined and documented, increasing consistency in scoring across judges and setting clear expectations for scorers. ▶ Scoring is blind (process by which evaluators rate the responses without specific knowledge of which entity is tied to which answer), reducing the risk of bias in the RFP process. ▶ Distinct weightings are used. This method allows each criterion to be measured on the same scale. Each criterion also has a weight by which the score is multiplied to give it a total weighted score. This makes scoring easy and verifies that the most important criteria are given greater consideration. ▶ Technology is incorporated into the RFP scoring process.
Recommendations	
<ul style="list-style-type: none"> ▶ Develop and document leading practices for RFP evaluation committees. This should include: <ul style="list-style-type: none"> ▶ Minimum requirements of knowledge represented within the evaluation committee and process for appointing and selecting members (requirements of knowledge may vary, depending on the service being procured). ▶ If required knowledge is not available, consider outsourcing the RFP process. ▶ We recommend that RFP scoring is performed blind. RFP evaluation criteria should be specifically outlined in sufficient detail to enable consistent interpretation of responses. 	

Formal monitoring program

The quality and sufficiency of monitoring performed by the SWLWDB Board Staff is limited due to resource limitations and unclear expectations on WIOA responsibilities.

Observation	Leading practice
<ul style="list-style-type: none">▶ The SWLWDB has established monitoring procedures, which are documented in a formal policy. Per the Monitoring policy, SWLWDB has two assigned staff for the purpose of monitoring all WIOA programs (a Youth Coordinator and Operations Manager). The monitoring activities described in the policy are delegated between these two staff, with the Youth Coordinator being responsible for monitoring participant files and the Operations Manager being responsible for fiscal monitoring.▶ Based on interviews, the actual level of monitoring may be inadequate due to resource availability and limitations at the Board Staff level.<ul style="list-style-type: none">▶ Board Staff responsible for WIOA monitoring have been given additional duties and assignments by the administrative entity, which are not related to WIOA. As a result, WIOA monitoring has not been performed timely or comprehensively.▶ The Monitoring policy states that participant files are monitored at least once a quarter for each program and the results (and request for corrective action plan, if necessary) are shared with the One-Stop Director and Service Provider. To date, only one a monitoring report has only been completed for one program and shared with the OSO.▶ The policy states that monitoring activities will include on-site AJC visits; however, it was mentioned during interviews that an on-site review has not yet taken place at any AJC.	<ul style="list-style-type: none">▶ Monitoring policies are updated and customized to reflect the specific needs of the area. Policies include detail over specific monitoring activities (who is being monitored), monitoring criteria (what is being monitored) and the monitoring schedule (when does monitoring occur). Monitoring is performed in line with documented policy.▶ Monitoring results are used to understand trends and identify root-cause issues.▶ Roles and responsibilities are clearly documented and understood among all employees. Monitoring activities are performed effectively and efficiently without redundancy.
Recommendations	
<ul style="list-style-type: none">▶ The specific roles and responsibilities of Board Staff should be clearly defined, communicated and understood. Where possible, Board Staff positions should be fully dedicated to WIOA program responsibilities. If the administrative entity manages several programs, measures should be taken to verify that the Board is appropriately staffed and all WIOA responsibilities have been proportionately allocated.	

Fiscal management

There are communication breakdowns between the Board Staff and the Fiscal Agent, leading to the perception of poor performance and mistrust between the two parties.

Observation	Leading practice
<ul style="list-style-type: none">▶ Although employed by the same entity (SWHRA), the relationship between Fiscal Agent staff and Board Staff appears to be strained.▶ In interviews, Board Staff mentioned they are not satisfied with the level of detail, timeliness or transparency of the reports provided by the Fiscal Agent. Additionally, Board Staff are performing duties that typically fall under the responsibilities of a Fiscal Agent (as seen at other LWDAs), including:<ul style="list-style-type: none">▶ Reconciling Grants4TN with Jobs4TN/VOS▶ Fiscal monitoring▶ Reviewing service provider invoices▶ There have been instances of overspending on contracts on multiple occasions. The Board Staff considers the lack of visibility into fiscal standing to be a root cause of this issue.▶ Due to the perceived lack of financial visibility, Board Staff maintain an entirely separate database (MS Access) to track and monitor contracts using data pulled independently from Grants4TN.▶ While the Fiscal Agent does provide month-end expenditure reports, the Board Staff have requested more timely visibility into their administrative costs. This request has been made to the Fiscal Agent, but there appears to be a communication breakdown and/or misunderstanding around whether the information is being provided or not.	<ul style="list-style-type: none">▶ In other areas, the Staff to the Board and Fiscal Agent have worked well together to achieve a shared vision. This relationship is critical to a high-functioning and efficient workforce development area.▶ The Fiscal Agent falls under the responsibility of the CLEO. Having an engaged CLEO that is in step with the mission and vision of the local board is vital to a high-functioning LWDA.
Recommendations	
<ul style="list-style-type: none">▶ We recommend implementing a process to periodically re-evaluate the performance and viability of the Fiscal Agent and/or administrative entity. Consider including this process as part of the onboarding procedures whenever a new CLEO is elected (given that the appointment of the Fiscal Agent is a responsibility of the CLEO).▶ Should issues arise between the Board Staff and the Fiscal Agent, the CLEO and Board Chair should be consulted to work toward a common solution.	

Enablement Technology

Technology

The Southwest LWDA faces technology limitations that lead to process inefficiencies.

Focus area	Key observation
System limitations	<p>Similar to other LWDAs, the reporting capabilities in VOS are a challenge for endusers. Specifically, the volume of reports and lack of customization options have been pain points.</p> <p>Based on interviews, Board Staff would benefit from additional training on how to use VOS to monitor performance. During interviews, it was noted that trainings hosted by Geographic Solutions (the VOS software provider) would provide value, but the SWLWDB lacks the administrative budget to attend.</p> <p>VOS does not have a functionality that allows for tracking participant referrals. Referrals are currently tracked outside of VOS using a paper form developed by the AJC Team Leads, and then eventually updated in VOS once the referral process is complete.</p> <p>Interviewees noted that Grants4TN does not allow endusers to generate or export any reports. The Fiscal Agent is manually tracking and monitoring MPCR on a monthly basis, but mentioned that the ability to export data from Grants4TN would make this process easier.</p>
Centralized data entry into VOS	<p>MCHRA (the contracted OSO and CSP provider for SWLWDA) uses a centralized process for uploading and reviewing documentation in VOS. Case Managers and Career Service Specialists send documentation to the MCHRA central office, where there is a team dedicated and trained to enter participant data and upload documentation in a complete and consistent manner. Interviewees expressed their confidence in this process to reduce the risk of incomplete or inaccurate data reported in VOS.</p>
Recommendations	
<ul style="list-style-type: none">▶ Consider the development and implementation of repeatable data analysis programs that can automatically extract, organize and present data.▶ Consider the feasibility of implementing a reporting tool that utilizes VOS data. We recommend a reporting tool that has an automated data collection feature.	

Enablement

Skills and communication

Skills and communication

There are opportunities to enhance the understanding of value and purpose of the firewall within the LWDA system.

Focus area	Key observation
Training	Based on interviews, it was noted that several stakeholders welcomed training on performance management. Board Staff noted VOS has the capability to develop ad hoc reports; however, they currently do not understand how to use this capability. The Board Chair welcomed Board training on LWDA management leading practices including performance management.
Communication	There are communication issues between the Staff to the Board and the Fiscal Agent. The Staff to the Board performs certain fiscal responsibilities and due to the limited communication, they maintain and track expenses on a separate database. There is an opportunity to address communication gaps between both stakeholders. Refer to slide 17 for further detail and recommendation.
Firewall	The WIOA Director, Board Staff, Regional Director, State AJC Lead, OSO and CSP understand the “firewall” concept and the value it provides in verifying segregation of duties. The CLEO was not familiar with the firewall concept and other stakeholders were dissatisfied with the additional administrative costs related to subcontracting the OSO and CSP roles. There is an opportunity to build awareness of the value and purpose of the firewall.
Recommendations	
<ul style="list-style-type: none">▶ Consider providing targeted training on performance management to highlight leading practice activities to the Board Staff and Staff to the Board.▶ Consider refreshing the firewall concept, purpose, and allowed communications and activities for each key role.<ul style="list-style-type: none">▶ Develop a communication that includes practical examples of firewall allowed and disallowed communication topics for SWLWDA to better understand the appearance of conflict of interest provision.	

Appendices

Appendix A: RACI matrix

Activity	Sub-activity	TDLWD/Central Office	Regional Director	CLEO/LEOs	LWDB	Fiscal Agent	SWHRA Executive Director	WIOA Director/Staff to the Board	OSO	Career Service Provider	Third-Party Procurement Eligibility Service Provider	Other
Vendor due diligence*	Define procurement policies	R	C	C	C		I	A				
	Define procurement processes, tools and templates	R	C	C	C			A				
	Perform sourcing risk management		I	I	I			R/A				
	Action procurement policy noncompliance	R		A	I		I	R/A				
Vendor selection*	Prepare and conduct market assessment		C	I	I			R/A	I	I		C
	Develop RFP to include KPIs and targets		R	I	I			R/A				C
	Review and approve RFP		C/I	C/I	R			A				
	Distribute RFP		I	I	I		I	R/A				
	Prepare and conduct sourcing and bid event	I	I	I	I		I	R/A				
	Conduct sourcing evaluations		C	I	C		I	R/A				
	Select Vendor		C/I	C/I	R		I	A				

*Refers to competitive RFP process (OSO, CSP)

R – Responsible, A – Accountable, C – Consulted, I – Informed

Appendix A: RACI matrix

Activity	Sub-activity	TDLWD/Central Office	Regional Director	CLEO/LEOs	LWDB	Fiscal Agent	SWHRA Executive Director	WIOA Director/Staff to the Board	OSO	Career Service Provider
Contract and grant management*	Contract creation and authorization						I	R/A		
	Contract execution				I	R	R	A		
	Contract monitoring							R/A		
	Contract compliance					R		A	R	R
Operational compliance and monitoring	Determine operational key performance indicators (KPIs)		C	I	C		I	R	I	I
	Monitor and track performance against operational KPIs		I	I	I		I	R/A	I	I
	Execute performance reviews		I	I	I			A	R	A
	Report scorecards and performance results		I	I	I		I	A	R	A
Regulatory compliance and monitoring	Develop SWTLWDA Strategic Plan		C	C	C			R/A + partner input	I	I
	Communicate regulatory requirements and policy changes	R	I	I	I	I	I	A	I	I
	Monitor and track performance against negotiated performance measures	R	I	I	A			A		
	Monitor and track performance against fiscal requirements	R	I	I	A	I		I	I	I
	Execute performance reviews	R	I	I	I	I		A	I	I
	Report scorecards and performance results	R	I	I	A	I	I	A	A	A
	Identify and correct noncompliance	R	C	I	I	C	I	A	C	C

*Refers to OSO and CSP contracts

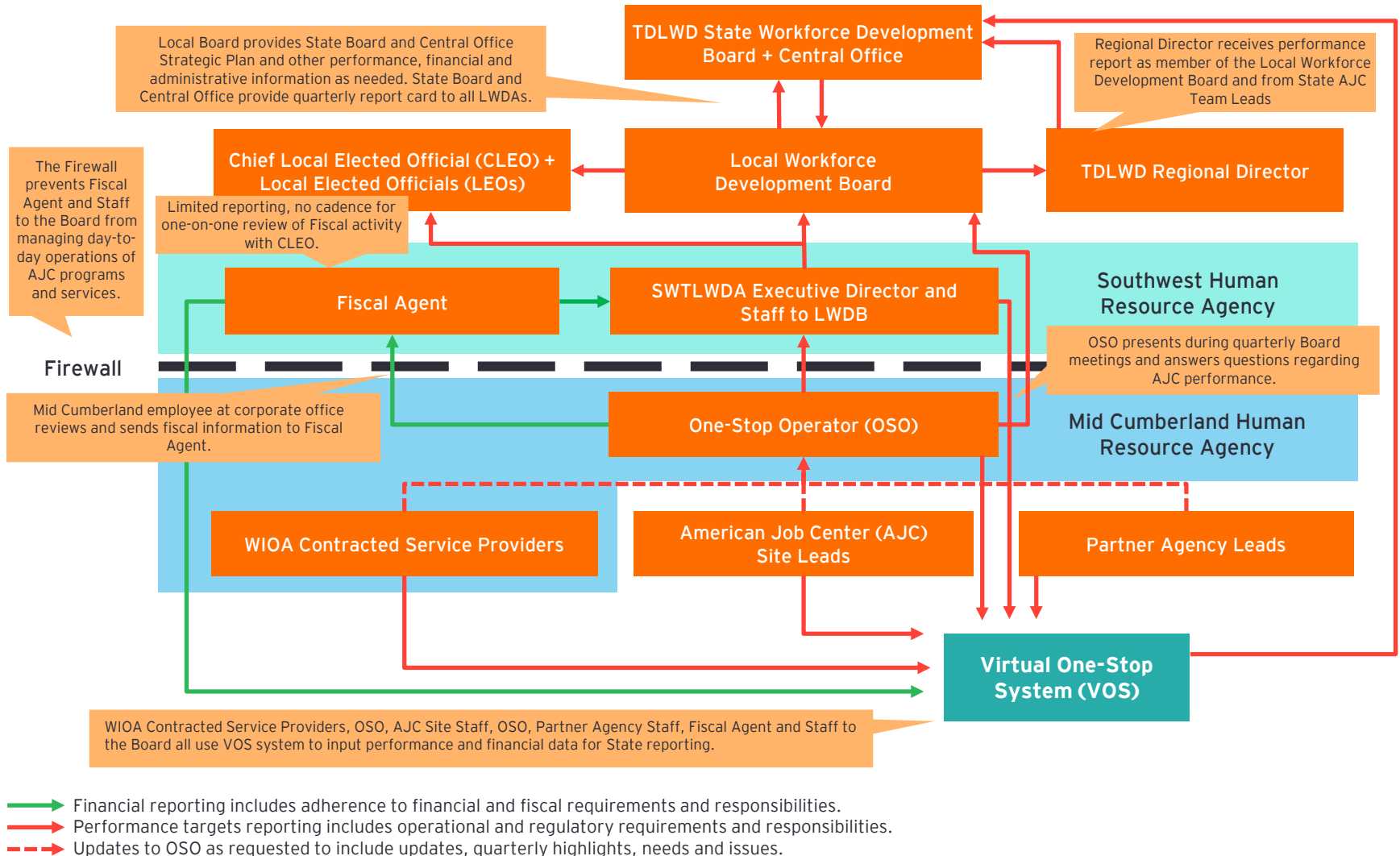
R – Responsible, A – Accountable, C – Consulted, I – Informed

Appendix A: RACI matrix

Activity	Sub-activity	TDLWD/Central Office	Regional Director	CLEO/LEOs	LWDB	Fiscal Agent	SWHRA Executive Director	WIOA Director/ Staff to the Board	OSO	Career Service Provider	Partners	Other
Financial management	Develop SWTLWDA Budget		I	I	C	C		R/A	C	C	C	
	Approve SWTLWDA Budget			I	I	R/A	I	I				
	Develop IFA		C	I	I	I		R/A	C	C	C	C
	Approve IFA	R	I	I	I	I		A	I	I	R	
	Prepare expenditure reports					R/A						
	Review and approve expenditure reports	A				R	I	R				
	Review OSO and CSP invoices					R		R/A				
	Pay OSO and CSP invoices and expenses					R/A						
	Pay operating expenses					R	I	A				
	Submit reimbursement claims					R/A						
	Monitor expenditures			I	I	R	I	A				

R – Responsible, A – Accountable, C – Consulted, I – Informed

Appendix B – Current SWTLWDA organizational structure



Appendix C – Technology landscape

System	Purpose	Users	Key usage areas			Risks and observations
			Financial Management	Performance and Contract Management	One Stop Job Center Operations	
Jobs4TN/ VOS	Collect and maintains participant data. Serves as a repository for referrals and other metrics that is used by the State to develop performance reports. Used to record case notes on participant activities and document supporting evidence of eligibility and participant payments. Data is used to perform analysis for trends, performance monitoring and reporting.	AJC Staff, TDLWD, Board Staff, OSO and participants		X	X	During interviews, key stakeholders described the system as not all encompassing of the data they want it to retain and report on. The reporting capabilities of the system make gathering and analyzing data an inefficient process.
Grants4TN	Used to maintain records of financial transactions. Used to submit monthly expense reports and status reports to the State.	Fiscal Agent	X			Data is entered into the accounting system and in Grants4TN, there is no communication between the two. This is a very timely process and also poses the risk of data integrity. Data between Jobs4TN, Grants4TN and MIP Abila must be manually reconciled as the systems do not interface.
MIP Abila	Fund accounting software used by the Fiscal Agent.	Fiscal Agent	X			
MS Access Database	Used by Board Staff to track and monitor contracts using data pulled independently from Grants4TN.	Board Staff	X	X		There is a risk to data accuracy as well as a potential for duplication of efforts between Board Staff and Fiscal Agent.
Social Media	Used to promote branding and awareness of the AJCs in the NWLWDA in an effort to increase enrollment.	Board Staff		X	X	A social media policy should be in place to outline how the organization and its employees should conduct themselves online. Users of the social media platforms should receive appropriate training.

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